

**U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
Timothy M Hollinger

Debtors.

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Case No.: 21-10199-mdc  
Chapter 13

**DEBTOR'S RESPONSE TO THE CHAPTER 13 STANDING TRUSTEE'S  
MOTION FOR DISMISSAL**

Sirs:

The Debtor, by and through his attorney, George R Tadross, hereby responds to the Chapter 13 Trustee's Motion to Dismiss and in support thereof states the following:

1. The Debtor made a plan payment on August 1, 2022 in the amount of \$810.00. Debtor will be making a payment in the amount of \$2,324.99 on August 31, 2022 which will bring his plan payments current.

WHEREFORE, the Debtor requests this Honorable Court Order deny Chapter 13 Trustee's Motion for Dismissal or such other relief that this Court deems just and proper.

Dated: August 3, 2022

/s/ George R Tadross

George R Tadross, Esquire  
128 Chestnut Street, Suite 301B  
Philadelphia, PA 19106  
215-500-5000 (phone)  
267-885-2377 (fax)  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Kenneth E West mdc@ph13trustee.com, and United States Trustee at USTPRegion03.PH.ECF@usdoj.gov.

DATED: August 3, 2022

/s/ George R Tadross

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